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Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF JOINT SUBMISSION
RE: DEPOSITION OF GOOGLE
OFFICER LORRAINE TWOHILL**

Referral: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google
7 LLC’s Administrative Motion to Seal portions of a Joint Statement Re: Deposition of Google
8 Officer Lorraine Twohill (“Joint Submission”). In making this request, Google has carefully
9 considered the relevant legal standard and policy considerations outlined in Civil Local Rule 79-5.
10 Google makes this request with the good faith belief that the information sought to be sealed consists
11 of Google’s confidential and proprietary information and that public disclosure could cause
12 competitive harm.

13 3. Google respectfully requests that the Court seal the redacted portions of the Joint
14 Submission.

15 4. The information requested to be sealed contains Google’s confidential and
16 proprietary information regarding highly sensitive features of Google’s internal systems and
17 operations, including details related to various types of Google’s internal projects and their
18 proprietary functions, that Google maintains as confidential in the ordinary course of its business
19 and is not generally known to the public or Google’s competitors.

20 5. Such confidential and proprietary information reveals Google’s internal strategies,
21 and business practices for operating and maintaining many of its important services, and falls within
22 the protected scope of the Protective Order entered in this action. *See* Dkt. 61 at 1-2.

23 6. For these reasons, Google respectfully requests that the identified portions of the
24 Joint Submission be filed under seal.

1 I declare under penalty of perjury of the laws of the United States that the foregoing is true
2 and correct. Executed in San Francisco, California on December 16, 2021.

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4 DATED: December 16, 2021

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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6
7 By /s/ Jonathan Tse

Jonathan Tse

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9 *Attorney for Defendant*
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